

U.S. Environmental Protection Agency Office of the Administrator Procedures for Responding to Freedom of Information Act Requests

1. PURPOSE

These procedures provide instructions for responding to Freedom of Information Act requests submitted to the EPA for records held by the Office of the Administrator. They address statutory, regulatory, policy, procedural and processing requirements to be followed by the AO associate-administrator-led offices, staff offices and the Immediate Office of the Administrator.

2. SCOPE AND APPLICABILITY

These procedures cover work performed by EPA employees, grantees, contractors and interns in support of FOIA activities in all AO offices.

3. AUDIENCE

The audience for these procedures includes all AO organizations, officials and employees, as well as contractors, grantees and others operating on behalf of the EPA.

4. AUTHORITY

- Freedom of Information Act, 5 U.S.C. § 552
- EPA FOIA Regulations, Title 40, C.F.R. Part 2, Subpart A
- CIO Policy 2157.1, Freedom of Information Act Policy

5. PROCEDURES

The EPA's FOIA regulations direct the public to send FOIA requests in writing to EPA headquarters, regional FOIA offices or through a form on the agency's FOIA website, which provides a link to FOIAonline. Requests received in any other office should be immediately forwarded to the Records, FOIA, and Privacy Branch, Office of Environmental Information (national FOIA office).FOIA office. See 40 C.F.R. 2.102(a).

The actions identified in steps 1-5 below are performed by staff in national FOIA office in the Office of Environmental Information.

Initiating the Process

The FOIA process officially begins when a request is received in the national FOIA office. Requesters may request a fee waiver and/or expedited processing at the time they submit their requests.

Step 1 – Receive, Review and Acknowledge Incoming Requests. The public may submit requests to the agency via FOIAonline, postal mail, email or hand delivery. The national FOIA office will verify that the request: 1) is in writing; 2) provides a mailing address; 3) asks for EPA records; and 4) reasonably describes the records sought. A description is sufficient if it enables an agency employee familiar with the subject area to locate the record with a reasonable amount of effort. See also 40 C.F.R. § 2.102(c).

Improper FOIA requests include:

- *Requests that do not reasonably describe the records sought; or*
- *Requests that pose questions rather than seek documents.*

FOIA does not require the EPA to:

- *Create new records or future records in response to a request;*
- *Re-create records that were properly destroyed;*
- *Produce records over which the agency retains no control;*
- *Provide records that the EPA already has made available to the public; or*
- *Produce purely personal records.*

If the requester utilizes FOIAonline and provides an email address, FOIAonline will automatically send a receipt to the requester that includes the tracking number and submission date for all requests processed in the system. Requests received after 5 p.m. Eastern time or on weekends or holidays are not considered received until the next business day. If a request is not received through FOIAonline, the national FOIA office will enter the request in the system within one working day of receipt and issue an acknowledgement through FOIAonline if an email address is provided. Postal mail will be used by the national FOIA office if an email address is not provided. The acknowledgement letter will provide the tracking number and the date the request was received by the EPA.

Step 2 – Determine if the Request is in the Correct FOIA Office. The national FOIA office will determine where responsive records are most likely located in the agency and will assign the request in FOIAonline to the appropriate office for processing. See also 40 C.F.R. § 2.103(a).

FOIA allows agencies up to 10 working days to route a misdirected request before the 20 working-day period to respond begins. For the purposes of this 10-day allowance, a request is misdirected if it is sent to a FOIA office that is not located with the program or regional office that will have the responsive records. Requests sent by the public to an office other than a FOIA office are also misdirected and must be immediately sent to the national FOIA office.

Step 3 – Determine the Fee Category. The national FOIA office will determine how requesters will be charged processing fees based on their fee category. The fee categories under the FOIA are: (1) commercial use, (2) educational institution or noncommercial scientific institution, (3) representative of the news media and (4) other. See also 40 C.F.R. § 2.107. See Step 8 below for information on calculating fees.

Step 4 – Process Fee-Waiver and Expedited Processing Requests. All requests for fee waivers and expedited processing must be submitted with the initial FOIA request (see 40 C.F.R. § 2.107(I) (5)). Decisions on fee waiver and expedited processing requests will be made by the EPA FOIA officer based on the factors outlined in 40 C.F.R. § 2.107(I) (5) and 2.104(e), respectively.

The EPA FOIA officer will make the initial decision whether to grant or deny a fee waiver or expedited processing request. The individual (where?) assigned the request will be notified via an email from FOIAonline that a determination has been issued. If the fee waiver or expedited processing request is assigned to a group rather than to an individual, FOIAonline will not send an email but will provide an internal system message to each group member the next time that person logs on.

The EPA must decide whether to grant or deny an expedited processing request within 10 calendar days of receipt. If the request is granted, it must be given priority by the action office and be the next request in line for processing. See C.F.R. § 2.104(3) (4). However, the request itself is not required to be processed within the 10 calendar days.

Step 5 – Assign the Request to the Action Office. In most cases, the national FOIA office will assign the request in FOIAonline to the primary FOIA coordinator in the program or regional office believed to most likely house the majority of responsive records.

Often, additional programs and/or regions may have responsive records (“contributing office”). The action office may assign each contributing office a task in FOIAonline to provide responsive records. These contributing offices will coordinate the agency’s response with the action office, including uploading responsive records to FOIAonline and communicating with the requester.

Processing the Request in Action Offices

The Office of the Administrator has a primary FOIA coordinator, the AO FOIA coordinator, in the Office of the Executive Secretariat who receives the assignment from the national FOIA office.

When an assignment is received from the national FOIA office, the AO FOIA coordinator will determine which AO offices are likely to have records responsive to the request and will assign the request to the appropriate office or FOIA professional using FOIAonline. Unless otherwise stated, the AO office that has responsive records bears primary responsibility for responding to the requester. 40 C.F.R. § 2.103(a).

For large, complex FOIA requests, the AO FOIA coordinator and/or action office may convene meetings with all interested agency parties to clarify responsibilities, methods to be used for collection and similar issues. Such meetings will include programmatic experts, records liaison officers, information technology specialists and legal counsel, as appropriate.

Step 6 – Determine Search Parameters. The action office will determine the cut-off date for records subject to the request. Under the EPA’s regulations (40 C.F.R. § 2.103 (a)) for determining what records are within the scope of the request, the action office will usually include only those records in its possession as of the date the request was received by the national FOIA office, unless the request specifically seeks a more limited scope. If a different date is used, the action office will inform the requester of that date.

The request also will be reviewed to determine the subject matter of the records the requester is seeking. If it is deemed necessary for the person processing the request to obtain clarification or additional information from the requester, the time necessary to reformulate the request will be excluded from the statutory 20 working-day period (or any authorized extension of time) that the EPA has to respond to the request. FOIA permits the agency to stop the clock once during the first 20 days after receipt to seek information and clarification from the requester.

Although the requester may be contacted as many times as needed to clarify the scope of the request, the clock may be stopped only once. Once the clock has been stopped, it should not be restarted until the information or clarification is provided. All communications must be documented for the official record and entered into FOIAonline and the deadlines adjusted in the system, as appropriate.

Step 7 – Determine if Additional Responsive Records are in Other Agency Organizations. Action offices should return misdirected requests to the AO FOIA coordinator for reassignment. The AO FOIA coordinator or staff office FOIA coordinators may create a task in FOIAonline to request records from the other program or regional offices as needed.

Step 8 – Estimate Processing Fees. The EPA's FOIA regulations require an assurance of payment from the requester if fees are expected to exceed \$25.00 or an amount specified by the requester. Unless a waiver of fees has been granted by the national FOIA Officer, the action office will estimate the processing fee that will be charged as specified in 40 C.F.R. § 2.107.

Search fees may apply even when no responsive records are identified or no responsive records are disclosed to the requester. The EPA's FOIA regulations (40 C.F.R. § 2.107(j)) also define circumstances where it may be appropriate to require advance payment of the estimated fees if the fees are expected to exceed \$250.

Fees are determined by the type of staff performing the work, the type of requester and the category of work performed. Fees are calculated pursuant to EPA regulations at 40 C.F.R. §2.107.

Step 9 - Determine Response Time. FOIA requires agencies to provide a substantive response within 20 working days. In such instances when the action office determines the response cannot be completed within 20 working-days, the EPA may extend the due date if unusual circumstances as defined by FOIA apply.

An unusual circumstance exists when there is: (1) a need to search for and collect the requested records from field facilities or other establishments that are separate from the office processing the request; (2) a need to search for, collect and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request; or (3) a need for consultation, which will be conducted with all practicable speed, with another agency or among two or more components of the EPA having a substantial interest in the determination of the request.

If unusual circumstances exist and there is a need to extend the due date for 10 working days or fewer, the action office must, within the 20 working-day time limit, notify the requester in writing that unusual circumstances exist and provide the new due date. When the unusual circumstances result in a need to extend the due date for more than 10 working days, the action office must also provide the requester, within the 20 working days, the contact information for the EPA's FOIA public liaison and an opportunity to either (a) modify the request so that it may be processed within the 10 working-day extension or (b) arrange an alternative time period for processing the original or modified request.

Step 10 – Collect and Review the Records. The action office and each contributing office is responsible for identifying, collecting and reviewing records within the scope of the request as discussed in Step 6 and as outlined in any organization-specific procedures. This includes the responsibility for consultation and referral with other federal agencies. Contributing offices are also responsible for coordinating responsive activities with the action office (the office that has most of the responsive records) when more than one office has responsive records (see Step 5 above). The action office and each contributing office should also ensure that protected information has been redacted from records before they are released.

The action office and contributing offices will: 1) ensure that redacted information cannot be read through photocopied records; 2) remove hidden metadata as appropriate (e.g. Microsoft Word document properties); and 3) annotate records with the applicable FOIA exemption(s) at the location of the redacted information.

Step 11 – Determine Which Records or Portions of Records May Be Released. After review, the action office will prepare to release responsive, non-exempt records or portions of records. All records released or withheld in full in response to a FOIA request must be reviewed by at least two knowledgeable individuals, including one manager or supervisor to ensure openness, transparency, consistency and the appropriate application of FOIA exemptions. One of the reviews may be performed by the individual who processes the request. AO action offices may consult with the AO FOIA coordinator, OEX FOIA attorneys, the agency FOIA officer or the Office of General Counsel for questions regarding withholding of records under a FOIA exemption.

Responsive records that have been properly reviewed and redacted, if necessary, will be subject to one of the following outcomes:

- a) Release in Full. The record, in its entirety, is released to the requester.
- b) Partial Grant/Partial Denial. Portions of the record are withheld from the requester if covered by one or multiple FOIA exemptions. The portions of the record that are not redacted are released to the requester.
- c) Withhold in Full. The record, in its entirety, is withheld from the requester if covered by either one or multiple FOIA exemptions.
- d) No Record. If, after a reasonable search likely to uncover responsive documents, no records are located that are responsive to the request, the requester will be informed in writing.
- e) Confidential Business Information. For records or parts of records that have been claimed as CBI or would be claimed as CBI if the business knew the EPA proposed to disclose the information, the procedures set out in 40 C.F.R. § 2.204 must be followed.
- f) Glomar Response. In some instances, the EPA may expressly refuse to confirm or deny the existence of records responsive to a FOIA request; this is called a Glomar response. The response letter will inform the requester that the request is denied because “either the records do not exist or they are exempt from mandatory disclosure under the applicable provision of FOIA.” The action office must obtain approval from OGC prior to issuing a Glomar response.

Step 12 – Prepare Response Letter. The action office will prepare the response letter using plain writing and obtain necessary concurrences from managers or senior officials. All response letters must include: (1) the FOIA tracking number and (2) appeal language, as appropriate. FOIA requesters have the right to appeal initial FOIA decisions made by the EPA if:

- No records were found;
- The response time exceeded the statutory authority or documented extensions;
- The request for expedited processing was denied;
- The request for a fee waiver was denied;
- The requester believes some records or portions of records were improperly withheld;
- The requester believes the search was inadequate; or
- The requester believes the fee category in which he or she was placed is incorrect.

In addition, response letters that communicate the withholding of agency records in total or in part are required to identify the:

- Records withheld individually or by category of similar documents if voluminous;
- Applicable FOIA exemption(s) under which the record is being withheld and a brief statement explaining the reason for the denial; and
- Authorizing official by name and title (see Step 14 below for list of Authorized Officials).

Step 13 – Obtain Approval from an Authorized Official to Release or Withhold Records. The Deputy Administrator, the general counsel, assistant administrators, the inspector general, regional administrators, associate administrators and heads of headquarters staff offices (or their appropriate designee) are delegated the authority to issue initial determinations to release or withhold records in response to FOIA requests. See EPA Freedom of Information Delegation of Authority, Section 1-30.

Initial determinations for both release and withholding determinations may be redelegated only to persons occupying positions not lower than division director or equivalent.

Step 14 – Respond to Request. The action office will provide the response letter, responsive records and invoice, when applicable, to the requester through FOIAonline. If an email address is provided, the requester will be notified via email that the responsive records are available in FOIAonline. Otherwise, the response package will be provided via the U.S. Postal Service.

The response letter must include a description of the information withheld either by category and volume or in a list. In all cases the response letter must also include the standard administrative appeal language.

Step 15 – Finalize Actions. The action office will ensure all supporting documentation is entered in FOIAonline (e.g. records of conversations or notes to the record). The record copy of the FOIA response will be maintained in FOIAonline, including all responsive records. Once published, these records become available for public searching and viewing.

The action office will close the request in FOIAonline.

6. RELATED DOCUMENTS

- EPA FOIA Regulations: <http://www.ecfr.gov/cgi-bin/text-idx?SID=6e03f1fcf8b91fe19d5ad1d462dad85c&node=40:1.0.1.1.2&rgn=div5>
- FOIA Statute: <http://www.justice.gov/oip/amended-FOIA-redlined.pdf>
- NARA Office of Government Information Services: <http://www.archives.gov/about/organization/summary/ogis.html>
- OCFO Payment of FOIA Legal Actions Against the EPA Policy: http://intranet.epa.gov/fmdvally/policies/direct/2540/2540-04-p2_foia.pdf
- OEI Information Access Procedures: <http://intranet.epa.gov/oei/imitpolicy/qic/ciopolicy/2171-p-01.pdf>

7. ROLES AND RESPONSIBILITIES

Action Office – The organizational unit, that is an associate-administrator-led office, staff office or the Immediate Office of the Administrator, that maintains the majority of records responsive to a FOIA request.

Agency FOIA Officer – The agency FOIA officer works in the Office of Environmental Information and serves as the program manager for the national FOIA program. The agency FOIA officer coordinates and oversees EPA

FOIA administration responsibilities; issues expedited processing and fee-waiver determinations; develops and reviews FOIA procedures, policies and guidance; provides advice to agency FOIA personnel; prepares annual reports for the Department of Justice; and provides FOIA training to agency employees and other individuals covered under Section 3 of these procedures.

Authorized Officials – The Deputy Administrator, the general counsel, assistant administrators, inspector general, associate administrators, heads of headquarters staff offices and regional administrators (or their appropriate designee) are authorized under section 2.113(b) of the EPA's FOIA regulations to issue initial determinations to release or withhold records in response to FOIA requests. Freedom of Information, EPA Delegations Manual, Chapter 1, Section 30, provides that this authority may be redelegated to the office director level or equivalent, who may redelegate to the division director level or equivalent.

Contributing Office – Organizational units that possess responsive records in addition to the action office.

Chief FOIA Officer – The designated senior official within each federal agency who has overall responsibility for the agency's compliance with the FOIA. At the EPA, the assistant administrator for the Office of Environmental Information is the chief FOIA officer. The chief FOIA officer is responsible for ensuring the efficiency and effectiveness of the agency's FOIA administration including compliance, accountability and reporting to the Administrator, the Department of Justice and the Office of Management and Budget on the status of the agency's FOIA program.

FOIA Coordinators – FOIA coordinators are the lead FOIA program administrators in each national-program and regional office. FOIA coordinators stay informed on requests and assignments; route requests to the appropriate action office or subject matter expert within the program office; track FOIA requests for timeliness; monitor the quality of the responses; and provide guidance to program personnel and senior officials in coordination with the agency FOIA officer. See also "Primary FOIA Coordinators."

FOIA Offices – The FOIA office is the point of receipt for agency FOIA requests where they are reviewed for conformance with the Act, acknowledged and assigned to the appropriate action office. The locations are identified in the EPA's FOIA regulations for submitting FOIA requests. Agency FOIA offices are located in each region and in the National FOIA Program in the Office of Environmental Information at headquarters.

FOIA Professional – An EPA employee or contractor who directly interacts with FOIA requesters and is responsible for day-to-day FOIA processing activities.

FOIA Public Liaison – The FOIA public liaison is the EPA contact point for the public if they have any issues with the agency's handling of their FOIA requests. The FOIA public liaison is the chief of the FOIA and Privacy Branch in the Office of Information Collection in the Office of Environmental Information. The public liaison supervises staff in the FOIA Requester Service Center and is responsible for assisting in reducing delays, increasing transparency and understanding of the status of requests and assisting in the resolution of disputes.

FOIA Requester Service Center – The FOIA Requester Service Center, also known as the FOIA Hotline, provides the public with information on the status of their requests if they do not have access to FOIAonline, general information on how and where to submit a FOIA request and about the types of information available on the EPA's websites. The hotline is staffed by the FOIA public liaison, agency FOIA officer and national FOIA program specialists. The hotline number is (202) 566-1667.

Managers and Supervisors – EPA managers and supervisors oversee FOIA coordinators to ensure that they have the knowledge, skills and ability to perform their duties and respond in a timely manner in accordance with FOIA. They review and approve all FOIA responses before release.

National FOIA Program – The national FOIA program is in the Office of Environmental Information and staffed by the agency FOIA officer and national FOIA program specialists who develop agency-level policies, procedures and trainings, respond to questions, provide guidance, deliver training and make decisions on fee waiver and expedited processing requests.

National FOIA Program Specialists – National FOIA program specialists manage the lifecycle of FOIA requests received at headquarters, assign requests to headquarter FOIA coordinators, prepare responses to fee waiver and expedited processing requests, approve requests to extend due dates, respond to questions from agency employees and staff the FOIA Hotline.

Office of General Counsel – OGC provides legal advice on FOIA matters, issues final decisions on FOIA appeals, final confidentiality determinations for CBI claims originating in HQ and fee waiver appeal determinations, except when a conflict of interest arises, provides counsel on FOIA exemptions and exclusions and assists the U.S. Department of Justice attorneys in FOIA litigation.

Office of Inspector General – OIG and the counsel to OIG provide advice on FOIA matters pertaining to its organization, issue initial determinations and final decisions on FOIA appeals, final confidentiality determinations, except when a conflict of interest arises, provide counsel on FOIA exemptions and exclusions and assist the U.S. Department of Justice attorneys in FOIA litigation.

Primary FOIA Coordinator – The lead FOIA coordinator in an organization. The AO FOIA coordinator is located in the Office of the Executive Secretariat.

Subject-Matter Experts – Subject-matter experts identify and locate records requested under FOIA. These individuals are located in all EPA organizations and include all professional disciplines. If permitted under the applicable delegation and after obtaining any necessary concurrences, the subject-matter experts may respond to requests directly or provide the responsive records to the FOIA coordinator, who facilitates the response for the agency. They must, however, follow the review process prescribed in this procedure.

8. DEFINITIONS

Administrative Appeal – An independent review of the initial determination made in response to a FOIA request. Requesters who are dissatisfied with the response made on their initial request have a statutory right under 40 C.F.R. § 2.104(j) to appeal the initial determination to an office in the Agency which will conduct an independent review. *(NOTE: OGC is responsible for managing all FOIA appeals at the EPA with the exception of appeals that involve FOIA requests to the OIG or FOIA requests where OGC is the action office on the initial response. OIG handles its own appeals. The Office of the Administrator processes appeals where the OGC is the action office on the initial response.)*

Case – All records pertaining to a FOIA request.

Commercial Use – A type of request from or on behalf of a person who seeks information for a use or purpose that furthers her or his commercial, trade or profit interests, which can include furthering those interests through litigation.

Consultation – When an agency locates a record that contains information provided by or of interest to another agency, it will ask for the views of that other agency on the disclosability of the records before any final determination is made. This process is called a consultation. See also referral.

Confidential Business Information – Trade secrets and commercial or financial information obtained from a person that is privileged or confidential.

Educational Institution – A preschool, public or private elementary or secondary school, an institution of undergraduate higher education, an institution of graduate higher education, an institution of professional education or an institution of vocational education, which operates a program or programs of scholarly research.

Existing records – Agency records that exist as of the date a FOIA request is received by the EPA.

Expedited Processing – The processing of a FOIA request out of the order in which it was received and prioritized over other pending FOIA requests. The standards for expedited processing are set out in the FOIA and in the regulations of each federal agency.

Fee Categories – Categories under FOIA that determine assessments of fees to requesters. Requesters fall into one of five fee categories: (1) commercial requesters; (2) educational; (3) noncommercial scientific institutions; (4) representatives of the news media; and (5) all other requesters.

Fee Waiver – A request made to an agency to waive any applicable fees for the processing of a FOIA request. Fee waivers are limited to situations in which a requester can show that the disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operations and activities of the government and is not primarily in the commercial interest of the requester. Requests for a fee waiver are evaluated on a case-by-case basis.

FOIAonline – The EPA's FOIA tracking and management system. See foiaonline.regulations.gov.

FOIA Exemptions – Contained at 5 U.S.C. § 552(b) (1)-(9). See intranet.epa.gov/foia/exemptions.html.

FOIA Time Limits – The time period in the FOIA statute for an agency to respond to a FOIA request, ordinarily 20 working days from the day a FOIA request is received and logged in by the appropriate FOIA office.

Freedom of Information Act – President Lyndon B. Johnson signed FOIA into law on July 4, 1966. The law provides individuals with a statutory right of access to certain federal agency records. FOIA requires agencies to disclose requested records unless they are protected from public disclosure by FOIA. Congress included in the FOIA nine exemptions and three law enforcement exclusions to protect important interests such as national security, personal privacy, privileged communications and law enforcement.

Full Denial – An agency decision not to release any records in response to a FOIA request because the records are exempt in their entirety under one or more of the FOIA exemptions or because of a procedural reason, such as when no records exist or could be located. A denial response must be signed by an authorized official.

Full Grant – An agency decision to disclose all records in full in response to a FOIA request.

Glomar Response – An agency's express refusal to confirm or deny the existence or nonexistence of records responsive to a FOIA request.

Initial Request – The request submitted by an individual to a federal agency for access to agency records on any topic. A FOIA request can generally be made by any person to any federal agency and requires only that requesters reasonably describe the records they are seeking and comply with agency regulations for making such requests.

Media Requester – Any person making a FOIA request who actively gathers news for an entity that is organized and operated to publish or broadcast news to the public that actively gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work and distributes that work to an audience. A request for records that supports the news-dissemination function of the requester shall not be considered to be for a commercial use.

Non-Commercial Scientific Institution – An institution that is not operated on a commercial basis but operated solely for conducting scientific research, the results of which are not intended to promote any particular product or industry.

No-Records Response – A FOIA request for which no responsive records were located.

Partial Grant/Partial Denial – An agency decision to disclose records or portions of records while withholding other records or portions of records that are exempt under FOIA or to otherwise deny a portion of the request for a procedural reason.

Pending Request or Administrative Appeal – A request or administrative appeal for which an agency has not taken final action in all respects.

Perfected Request – A request for records that clearly describes the records sought.

Processed Request or Processed Administrative Appeal – A request or administrative appeal for which an agency has taken final action in all respects.

Records – Information in an agency's possession and control in any format including electronic format. DOJ notes that for FOIA purposes *records* includes all tangible documentations of information regardless of whether they are records under the Federal Records Act (44 U.S.C. § 3301). This is a broader definition than that used by the EPA records program and records schedules.

Redact – The act of removing exempt information from responsive documents either manually or utilizing redaction software.

Referral – When an agency locates a record that originated with or is of otherwise primary interest to another agency, it will forward that record to the other agency to process the record and to provide the final determination directly to the requester. This process is called a referral. See also consultation.

Requester – Any individual (including non-U.S. citizens), corporation or association, public interest group and state, tribal, local or foreign government making a FOIA request. Requests from federal agencies, the Government Accountability Office, the Speaker of the House, the President of the Senate and the chairman of a committee or subcommittee are not processed under these procedures.

Responsive Record – A record falling within the scope of a FOIA request that an agency has located that may be provided or is under consideration for inclusion in a response to a FOIA request. A record may be responsive to a FOIA request but may still be withheld as protected from disclosure by a FOIA exemption.

Unusual Circumstances – When there is: (1) a need to search and collect documents from organizations separate from the organization processing the request; (2) a need to search and collect a large volume of records; or (3) a need to consult with another agency (or a separate subdivision of the same agency) having a substantial subject-matter interest in the request.

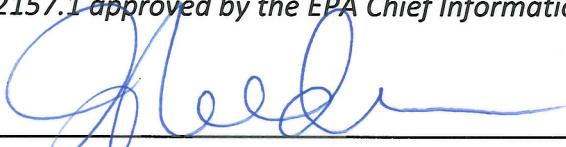
9. WAIVERS

No waivers will be granted for any of the requirements of this procedure.

10. ADDITIONAL INFORMATION

This document is not intended to create any rights or privileges for the public or obligations on the part of the EPA.

Issued by the AO Senior Information Official on March 30, 2015, pursuant to Information Directive Policy CIO 2157.1 approved by the EPA Chief Information Officer on September 30, 2014.



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